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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, DENIS
MOLINA, JHONY SILVA, MARIA ELENA
HERNANDEZ, O.C., SANDHYA LAMA,
S.K., TEOFILO MARTINEZ,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-05687-TLT

**DECLARATION OF S.F. IN SUPPORT OF
PLAINTIFFS' MOTION FOR PARTIAL
SUMMARY JUDGMENT**

Assigned to: Hon. Trina L Thompson

Date: November 18, 2025

Time: 2:00 p.m.

Place: Courtroom 9

Complaint Filed: July 7, 2025

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DECLARATION OF S.F.

I, S.F., declare:

1. I have personal knowledge of the facts set forth in this declaration. If called upon to testify as a witness, I could and would testify to these facts.

2. I am a citizen of Honduras. My husband and I are both TPS holders. We rely on Temporary Protected Status (TPS) for protection from detention and deportation, and work authorization. We have no other form of legal status in the United States. We are parents of two children, including our youngest who was born here and still lives at home. The termination of TPS has been devastating for me and my family. We have no good options. My husband and I have lost our work, and with it our health insurance which has been life-saving for me as I was diagnosed with breast cancer in 2022, have undergone various surgeries, and need continued treatment. My daughter's education has been disrupted. I am also afraid of being detained and deported to a country that I have not lived in for decades. I am writing this declaration to explain how I have relied on TPS and how my family and I have already been harmed by the termination of TPS.

TPS Protection

3. I came to the United States with my husband and one-year old son in September 1998 on a travel visa. In 1998, three weeks into our visit to the United States, I learned about the catastrophic and deadly hurricane that struck my country. Hurricane Mitch destroyed everything that my family and I owned in Honduras, including our home. Our friends and family in Honduras were focused on surviving and could not help us salvage our belongings while we were in the United States. All of our family memories, including family pictures and records, were swept away and destroyed in the cataclysmic flooding.

4. My family and I were distraught when we learned about the devastation caused by Hurricane Mitch, but we were also relieved that we were in the United States when tragedy struck. Because we were in the United States lawfully on a visitor visa and did not have a home to return to in Honduras, we extended our stay.

5. After we learned that Honduras was designated for TPS because of Hurricane Mitch, we applied for TPS protection. By January 1999, and while still on a valid visitor visa, I received

1 TPS along with my husband and son. I have always maintained TPS and we have never been without
2 status until now. My husband and I each had either a valid visitor visa or TPS.

3 **Impact on Work**

4 6. I have worked in the United States since receiving TPS and have paid my taxes.
5 Starting in 1999, I worked in a warehouse and then in 2012 transitioned to working in different
6 capacities in schools. Since 2012, I have worked at the same school district. Until recently, I had my
7 dream job working as a secretary at a school. I loved this job because I was promoted to this position
8 and was part of the team that opened the new school. I loved contributing to our community by
9 opening a new school and supporting families. Before becoming a secretary, I worked in the same
10 school district as a clerk. I was one of the many essential workers during the COVID pandemic and
11 ensured that students had all of the resources and materials they needed to continue their studies at
12 home. I never stopped working during the pandemic.

13 7. In September, I lost my job when I lost my TPS. I have no other means for work
14 authorization aside from TPS. As a result, I am currently unemployed.

15 8. My husband has worked in transportation. Prior to that, he worked in a warehouse
16 starting in 1999. He has worked in transportation for the past 18 years. He also lost his job when
17 TPS for Honduras was terminated. As a result, he is also unemployed.

18 9. My family is now relying on our limited savings. My school-age daughter has had to
19 work more hours, which she did not have to do before because my husband and I were always able
20 to provide for all of her needs through our work. This also adds to my daughter's stress because she
21 feels obligated to help us financially. And my 28-year-old son, who is just getting on his feet after
22 his studies, is also providing support, without which we would not be able to pay our bills and living
23 expenses. I am not sure how long we could survive like this. It has been devastating, after having
24 worked so long in the United States and feeling like we were doing everything that we were
25 supposed to do.

26 **Cancer Diagnosis and Treatments**

27 10. In 2022, I was diagnosed with breast cancer. Because I had health insurance through
28 my husband's work, I was able to go to my regular mammogram appointments. It was during one of

1 those appointments that I learned about my diagnosis. I was devastated by the news because all I
2 could think of was my family and how much they needed me.

3 11. My breast cancer treatment has been a long process. I underwent chemotherapy and
4 had side effects from my treatments. I lost my hair, suffered from a rash that covered my face and
5 body, and experienced severe diarrhea and fatigue. I also underwent a double mastectomy and a
6 bilateral breast reconstruction. To this date, I have had four surgeries because of my breast cancer.
7 The last surgery was about 10 hours long—it was a bilateral breast reconstruction to rebuild both
8 breasts after undergoing a mastectomy.

9 12. I need to continue my treatment to ensure that the cancer does not return, including
10 taking my medication. I have to go to my oncologist on a regular basis for check-ups. Because of the
11 treatments, I am also at increased risk for osteoporosis and have to undergo regular bone testing.

12 13. I was due for a scan as part my breast cancer remission treatment but will not be able
13 to attend the appointment because I do not have health insurance. When TPS was terminated for
14 Honduras, my family and I lost the health coverage we had through my husband's job. Without
15 health insurance, I cannot access all the treatments necessary to prevent breast cancer from returning.
16 I am terrified of the possibility of my breast cancer returning because I want to live to continue
17 giving back to my community and providing for my family.

18 **Family Impact**

19 14. My husband and I have two children.

20 15. My eldest child was one year old when we first arrived in the United States. He has
21 grown up here and is now a green card holder as he recently married a U.S. citizen. He had TPS
22 before he became a lawful permanent resident.

23 16. We also have a U.S. citizen daughter who was born here, and is 17 years old and a
24 senior in high school.

25 17. My 17-year-old daughter is a senior in high school and plans to apply to, and attend,
26 college. These past few years have been very hard on her, initially because of my 2022 cancer
27 diagnosis and now because my husband and I no longer have TPS.

28 18. Because my husband and I lost TPS, we are unable to work. We would lose our home

1 if we did not have the support of our children. As a result, my daughter has had to work 20 hours a
2 week while attending her last year of high school. She has been working at a retail store and I know
3 that it has affected her ability to focus on her education.

4 19. Prior to the TPS termination, I had plans to take my daughter to visit colleges and
5 universities. Her dream is to become a lawyer. But since I no longer have TPS, I am afraid to leave
6 my home for fear of being detained by immigration authorities. This means that I cannot take my
7 daughter to colleges and universities or even drop her off at school.

8 20. It breaks my heart that we may also not be able to help pay for my daughter's college.
9 When my oldest son was in college, we helped him with his expenses because my husband and I
10 both had jobs. My son was able to graduate from college, get a good job, and get married because we
11 were able to provide financially for him while he went to college. Now, my daughter is the one
12 having to work and help us pay our mortgage, all while completing her last year of high school and
13 applying to colleges.

14 **Mental Health Impacts**

15 21. Losing TPS has taken a tremendous mental toll on me. My husband and I lost our
16 jobs, health care, and our stability to provide for our family. I cannot sleep at night because I am so
17 anxious about the unknown and because I have not been without legal status since entering the
18 United States on a valid visitor visa. I feel broken inside. The only thing that keeps me going is my
19 family. I have to be strong for my daughter who is in her last year of high school and eager to go to
20 college. But I am afraid of being detained and deported. I am also afraid that my lack of health
21 insurance will deprive me of life-saving medical care that I have relied on to keep my breast cancer
22 in remission.

23 I declare under penalty of perjury that the foregoing is true and correct, and that this
24 declaration was executed at Denver, Colorado, this October 13, 2025.

25 SF

26 _____
27 S.F.
28

CERTIFICATE OF INTERPRETATION

I, Angélica Salceda, certify that I am fluent in Spanish and English and that I am competent to interpret between these languages. I further certify that I have read the foregoing to S. F. in Spanish. I further declare that I am competent to render this interpretation and that I would testify to the same under the penalty of perjury if I were called upon to do so.

Date: October 13, 2025



Angélica Salceda